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January 3, 2024

Via ECF

The Honorable Sarah Netburn, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

RE: *Lazo v. Falcone et al.*
No. 22 Civ. 10587 (SN)

Dear Judge Netburn:

This firm represents Defendants in the above referenced matter. I write jointly with counsel for the Plaintiff to provide a status report, and to respectfully request that this matter be stayed until March 15, 2024. A settlement conference was held before Your Honor on June 23, 2023, during which the parties reached an agreement whereby Defendants would pay Plaintiff the gross sum of \$40,000. Shortly thereafter, Defendants' financial situation changed significantly, and Defendants were no longer in a position to pay the settlement sum. After months of continued negotiations, and overcoming multiple hurdles, on December 15, 2023, the parties reached an agreement whereby Defendants would deposit the original sum of \$40,000 in four monthly instalments of \$10,000 to Defendants' counsel's escrow account in order to resolve this matter with a lump sum payment following collection of the funds. The first instalment was deposited into Defendants' counsel's escrow on December 15, 2023, and the final payment is to be made by March 15, 2024. To minimize costs and preserve judicial resources, the parties request that this matter be stayed until March 15, 2024, when the total \$40,000 sum will be fully deposited into Defendants' counsel's escrow, at which time the parties will file an accepted Rule 68 Offer of Judgment in resolution of this matter.

The parties thank Your Honor for your time and consideration.

Respectfully submitted,

/s/ William Brown

William Brown, Esq.

cc: all parties via ECF